

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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Attorneys for Non-Party Movants Daniel Edley and
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In re:
LTL MANAGEMENT LLC,
Debtor.¹

Defendants.

Chapter 11
Case No. 21-30589 (MBK)

Hearing Date: April 12, 2022
Objection Deadline: April 5, 2022

**NOTICE OF MOTION BY NON-PARTY MOVANTS DANIEL EDLEY AND
ROGER EDLEY FOR AN ORDER (I) CONFIRMING THAT THE
AUTOMATIC STAY AND PRELIMINARY INJUNCTION DO NOT APPLY
TO AN INTENDED PUTATIVE CLASS ACTION TO BE FILED AGAINST
JOHNSON AND JOHNSON AND OTHER NONDEBTOR DEFENDANTS,
OR, IN THE ALTERNATIVE, (II) GRANTING RELIEF FROM THE
AUTOMATIC STAY TO ALLOW THE INTENDED PUTATIVE CLASS
ACTION TO PROCEED**

PLEASE TAKE NOTICE that the Non-party Movants Daniel Edley and Roger Edley
("Movants"), by and through their undersigned counsel, shall move before the Honorable

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933

Michael B. Kaplan, Chief Judge, on April 12, 2022, at 10:00 a.m. at the United States Bankruptcy Court, District of New Jersey, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, or soon thereafter as the matter may heard, for the entry of an order (i) confirming that the automatic stay under Bankruptcy Code § 362 extended to cover Johnson and Johnson and other nondebtor defendants as Protected Parties by the Order of this Court along with the Court's Preliminary Injunction Decree under Bankruptcy Code §105 entered on March 7, 2022 (ECF No. 1635) do not apply to a putative class action against Johnson and Johnson and other nondebtor defendants that Movants intend to forthwith file in the Superior Court of New Jersey, Middlesex Vicinage, or, in the alternative, (ii) granting relief from the stay pursuant to § 362(d) of the Bankruptcy Code to allow the intended putative class action against Johnson and Johnson and other nondebtor defendants to proceed, and (iii) granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that the Movants shall rely upon the Memorandum of Law in Support of Motion by Non-Party Movants Daniel Edley and Roger Edley for an Order (i) confirming that the Automatic Stay and Preliminary Injunction do not apply to an intended putative class action to be filed against Johnson and Johnson and other nondebtor defendants, or, in the alternative, (ii) granting relief from the automatic stay to allow the intended putative class action to proceed, and the Declaration of Christopher M. Placitella, and the accompanying exhibits, submitted herewith pursuant to D.N.J. LBR 9013-1(a).

PLEASE TAKE FURTHER NOTICE that any papers in response to the Motion must be filed with the Court and served upon the Movants and other parties required to receive notice no later than seven (7) days in advance of the hearing date pursuant to D.N.J. LBR 9013-2(a)(2). If opposing papers are not filed and served within the required time, the Motion shall be deemed

uncontested pursuant to D.N.J. LBR 9013-3(d) and an Order may be signed and entered in the Court's discretion.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-3(d) oral argument may only be presented by a party that has filed opposition to the Motion

Dated: March 14, 2022

COHEN, PLACITELLA & ROTH PC

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